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**Cc:** Albright, David[Albright.David@epa.gov]; Chamberlain, Janel@DOC[Janel.Chamberlain@conservation.ca.gov]  
**From:** Dermer, Michele  
**Sent:** Fri 2/19/2016 7:40:08 PM  
**Subject:** FW: Aquifer Exemption Approvals

Hello Matt,

Your email to David Albright yesterday was forwarded to me for reply. I would be happy to try to answer your questions, but I wanted to first provide you with an important EPA document that you may not be familiar with. I've included the link below. This was also presented to the operators last year during the State's sponsored Aquifer Exemption Workshops.

EPA's completeness checklist used for the Alon review is based on the checklist you will find attached to the guidance document. Here is the link:

<http://www3.epa.gov/region09//mediacenter/uic-review/pdf/wdd-memo-on-aquifer-exemptions-2014-07-24.pdf>

Please give me some options for a call over the couple of weeks if you would like to discuss further. I will be traveling Tues-Thursday next week however.

Sincerely,

Michele

**Michele Dermer**

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**Sent:** Thursday, February 18, 2016 10:03 AM  
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**Subject:** Aquifer Exemption Approvals

Good morning David,

I recently received a copy of the checklist used for the ALON Refinery aquifer exemption in the Fruitvale Oil Field. After review, I had a few questions regarding the EPA's method of review for aquifer exemptions. Does the EPA treat the completeness check as an equivalent to the requirements (CFR 146.4)? I've noticed this checklist is much more comprehensive than the EPA regulations. I am working on aquifer exemptions within Central California which we plan to submit to the EPA and it would be difficult for us to meet every requirement on that checklist.

Can you fill me in on how the approval process works within the EPA? I would like our submissions to be as efficient as possible.

Thank you in advance,

Matthew Van Grinsven

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